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April 27, 2021

VIA ECF

Honorable Lois Bloom
United States Magistrate Judge
U.S. District Court, Eastern District of New York
225 Camden Plaza East
Brooklyn, New York 11201

Re: *Ramaj v. ConAgra Foods et al.*, Case No. : 1 :19-cv-00284-ENV-LB

Honorable Magistrate Judge Bloom:

Plaintiff writes to provide notice of supplemental authority relating to Defendant Conagra's April 13, 2021 letter motion requesting either the exclusion of Plaintiff's expert Mr. Gregory J. Cahanin or a 30-day extension of the current discovery schedule in order to take Mr. Cahanin's deposition. (Doc. 88).

Shortly after the motion was fully briefed before this Court, the district court in *Bozick v. ConAgra Foods, Inc. et al.*, Case No. 19-cv-4045-LJL (S.D.N.Y.), issued the attached opinion and order granting in part and denying in part a nearly identical motion filed by ConAgra concerning the same expert. **Exhibit A.**

Pursuant to the Order, the Honorable Judge Liman of the Southern District of New York also issued the attached Revised Case Management Plan, extending the deadline for completion of expert discovery to May 21, 2021 to accommodate the expected rebuttal report and/or deposition of Mr. Cahanin by ConAgra and extending the deadline to make a motion for Summary Judgment to June 18, 2021. **Exhibit B.**

Sincerely,

A handwritten signature in black ink, appearing to read "Gary J. Certain", with a stylized flourish at the end.

Gary Certain, Esq.

Cc: All Counsel of Record via ECF